

**Remarks**

Applicants respectfully request reconsideration of the present application in view of the above amendments and following remarks. Claims 1, 10, 12 and 14 have been amended and claims 4, 11 and 13 have been cancelled. Claim 16 has been added. Therefore, claims 1-3, 5-10, 12 and 14-16 are pending in the present application.

Claims 1-12 have been rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,263,386 to Campbell et al. ("the Campbell reference"). Claims 4 and 11 have been cancelled, therefore the rejection of these claims is moot. In view of the above amendments, Applicants respectfully traverse the rejection of claims 1-3, 5-10 and 12.

Amended independent claim 1 is directed to an anti-rotation guide for a valve lifter for an internal combustion engine having a camshaft disposed within an engine block of the engine, and a valve train. The anti-rotation guide includes a sleeve portion and an anti-rotation feature. The sleeve portion includes an inner surface, an outer surface, a first end and a second end. The anti-rotation feature is fixedly coupled to one of the first end and the second end of the sleeve portion for cooperating with the lifter to prevent axial rotation of the lifter within the guide. The anti-rotation feature is one of an arm and tang, or a flap. The sleeve portion is oriented when installed from an opening of a bore in the engine proximate the camshaft. The first end of the sleeve portion is adjacent to the camshaft and the second end of the sleeve portion is adjacent to the valve train.

The Campbell reference does not teach or suggest an anti-rotation guide having an anti-rotation feature fixedly coupled to one of a first end and a second end of a sleeve portion, wherein the anti-rotation feature is one of an arm and tang or a flap as recited in amended claim 1. In rejecting claim 1, the Examiner stated that the lifter gallery (12) in the Campbell reference teaches the sleeve portion and the slot (51) teaches the anti-rotation feature set forth in claim 1. See *Office Action dated January 30, 2006* ("Office Action"), pg. 2. As best seen in FIG. 1 of the Campbell reference, the slot (51) defined in the lifter gallery (12) is neither an arm and tang or a flap.

The Examiner also stated that the raised hat section (42) teaches an anti-rotation feature that is selected from the group consisting of an arm and tang, a flap and an orifice flat. See *Office Action*, pg. 3. The Examiner appears to be taking an inconsistent position on what he is identifying as the anti-rotation feature in the Campbell reference. On page 2 of the Office Action, the Examiner identified the slot (51) as the anti-rotation feature, and on page 3 of the Office Action, the Examiner stated that the raised hat section (42) is the anti-rotation feature. As set forth in the previous response to the Final Office Action, the Applicants submit that the raised hat section (42) does not teach the anti-rotation feature set forth in claim 1 because the raised hat section (42) is not fixed to one of a first end and a second end of the lifter gallery (12). Likewise, the slot (51) is not an anti-rotation feature that is fixedly coupled with one of a first end and a second end of a sleeve portion of the lifter gallery (12) since it is merely a notch cut out of a portion of the lifter gallery (12).

Since the Campbell reference fails to teach or suggest all of the limitations included in claim 1, Applicants request that the rejection of claim 1 be withdrawn. As claims 2, 3 and 5-9 depend from claim 1, these claims are also not taught or suggested by the Campbell reference for at least the same reasons set forth with respect to claim 1. Thus, Applicants request that the rejection of claims 2, 3 and 5-9 be withdrawn.

Dependant claim 2 further distinguishes the present invention from the Campbell reference. The Examiner appears to be misinterpreting claim 2 as a product by process claim. See *Office Action*, pg. 3. Claim 2 clearly states a structural limitation directed to the diameter of the outer surface of the sleeve portion being selected such that the guide is configured to be press-fit into the engine bore. As previously stated, the Campbell reference does not disclose that the lifter gallery (12) is positioned within an engine bore. Instead, the Campbell reference states that the lifter gallery (12) is located on the inner wall of a cylinder bank (14). See *Campbell*, Col. 2, lines 7-11; FIG. 1. In addition, the Campbell reference does not specify that the diameter of the lifter gallery (12) is selected so that the guide is configured to be press-fit into an engine bore. For this additional reason, Applicants request that the rejection of claim 2 be withdrawn.

Amended independent claim 10 is directed to an internal combustion engine having a camshaft and a valve train and a valve lifter. The engine includes an anti-rotation guide for receiving the valve lifter. The anti-rotation guide includes a sleeve portion and an anti-rotation feature. The sleeve portion includes an inner surface, an outer surface, a first end and a second end. The

anti-rotation feature is fixedly coupled to one of the first end and the second end of said sleeve portion for cooperating with the lifter to prevent axial rotation of the valve lifter. The anti-rotation feature includes one of an arm and tang or a flap. The sleeve portion is oriented when installed from an opening of a bore in the engine proximate the camshaft. The first end of the sleeve portion is adjacent to the camshaft and the second end of the sleeve portion is adjacent to the valve train.

For at least the same reasons set forth with respect to claim 1, Applicants submit that the Campbell reference does not teach or suggest all of the limitations included in claim 10. Specifically, the Campbell reference does not teach or suggest an anti-rotation feature fixedly coupled to one of a first end and a second end of a sleeve portion, wherein the anti-rotation feature includes one of an arm and tang or a flap as recited in claim 10. The Examiner introduced U.S. Patent No. 4,173,954 to Speckart ("the Speckart reference") to show a locking bar (60) to teach a flap set forth in the claims. However, the locking bar (60) disclosed in the Speckart reference is not fixedly coupled with one of a first end and a second end of a sleeve. Instead, the locking bar (60) passes through a pair of slots (47, 57) defined in the body of each of the lifter mechanisms (20, 34). See *Speckart*, Col. 1, lines 54-59; FIG. 1. For at least these reasons, Applicants request that the rejection of claim 10 be withdrawn. As claim 12 depends from claim 10, Applicants submit that this claim is also not taught or suggested by the Campbell reference for at least the same reasons set forth with respect to claim 10.

Claim 13 has been rejected under 35 U.S.C. § 103(a) as being unpatentable over the Campbell reference in view of U.S. Patent No. 4,173,954 to Speckart ("the Speckart reference"). Claim 13 has been cancelled, therefore the rejection to this claim is moot.

Claim 14 has been rejected under 35 U.S.C. § 103(a) as being unpatentable over the Campbell reference in view of U.S. Patent No. 4,448,155 to Hillebrand et al. ("the Hillebrand reference").

Amended claim 14 is directed to an internal combustion engine having a camshaft and a valve train and a valve lifter. The engine includes an anti-rotation guide for receiving the valve lifter. The anti-rotation guide includes a sleeve portion and an anti-rotation feature. The sleeve portion includes an inner surface, an outer surface, a first end and a second end. The anti-rotation feature is fixedly coupled to and integrally formed with one of the first end and the second end of said sleeve portion for cooperating with the lifter to prevent axial rotation of the valve lifter. The anti-rotation feature includes at least one orifice flat. The sleeve portion is oriented when installed from an opening of a bore in the engine proximate the camshaft. The first end of the sleeve portion is adjacent to the camshaft and the second end of the sleeve portion is adjacent to the valve train.

The combination of the Campbell reference and the Hillebrand reference do not teach or suggest an anti-rotation feature that is fixedly coupled to and integrally formed with one of the first end and the second end of the sleeve portion, wherein the anti-rotation feature is at least one orifice flat as recited in

claim 14. In the Campbell reference, the lifter gallery (12) does not include at least one orifice flat. With respect to the Hillebrand reference, the single guide bar (64) is not integrally formed with the boss (18). For at least these reasons, Applicants submit that claim 14 is not taught or suggested by the combination of the Campbell reference and the Hillebrand reference. Applicants request that the rejection of claim 14 be withdrawn.

Claim 15 has been rejected under 35 U.S.C. § 103(a) as being unpatentable over the Campbell reference.

Claim 15 is directed to the anti-rotation guide recited in claim 1 wherein the sleeve portion is removable from the bore in the engine. As stated above, the Campbell reference fails to teach or suggest an anti-rotation feature fixedly coupled to one of a first end and a second end of a sleeve portion, wherein the anti-rotation feature is one of an arm and tang or a flap as recited in claim 1. Since claim 15 includes all of the limitations included in claim 1, Applicants submit that claim 15 is not taught or suggested by the references of record for at least the same reasons set forth with respect to claim 1. Applicants request that the rejection of claim 15 be withdrawn.

New claim 16 depends from claim 14 and states that the anti-rotation feature includes two opposing orifice flats.

### **Conclusion**

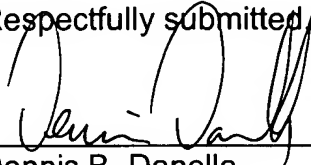
In view of the above, Applicants submit that claims 1-3, 5-10, 12 and 14-16 are in condition for allowance and such allowance is respectfully requested. Should the Examiner feel that any unresolved issues remain in this case, the

undersigned may be contacted at the telephone number listed below to arrange for an issue resolving conference.

Applicants do not believe that any fee is due at this time. However, the Commissioner is hereby authorized to charge any fee that may have been overlooked to Deposit Account No. 10-0223.

Dated: 4/28/06

Respectfully submitted,



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